



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 27, 2020

BY ECF

The Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: *United States v. Lawrence Ray, 20 Cr. 110 (LJL)*

Dear Judge Liman:

The Government writes in response to the Court's August 27, 2020 Order. (Dkt. 42). In advance of the next conference, the Government would like to provide the Court with materials referenced in the parties' briefing. The defense seeks an unprecedented and drastic change to the protective order. Such a change is particularly unwarranted where the defense continues to demur on identifying with specificity any material that the Government has improperly designated as sensitive, other than pointing to the "materials the defense explicitly requested the Government release from the sensitive designation" (Dkt. 42, Reply Br. 4), and which the Government listed in its brief (Dkt. 38, Gov. Br. 7). In order for the Court to better understand the parties' dispute, and to appreciate firsthand that this evidence is properly marked as "sensitive," the Government intends to provide copies of some of these materials to the Court, but requests to file the materials under seal because they are currently marked "sensitive" and contain private information about victims and potential witnesses in this case, including graphic sexual content, videos of physical and verbal abuse, and videos that are potentially humiliating to the third parties depicted in them. The Government also intends to provide defense counsel a copy of these materials, which the defense has also already received in "sensitive" discovery.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: /s/ Danielle R. Sassoon
Danielle R. Sassoon
Mollie Bracewell/Lindsey Keenan
Assistant United States Attorneys
(212) 637-1115

